

## REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Amendments to Claims

Claim 1 has been amended to include the limitations of claim 2, and claim 10 has been amended to include the limitations of claim 11.

In addition, claim 19 has been added to recite dual thresholding to detect attacks, as opposed to detection of attacks based on undershooting *or* overshooting of a threshold.

2. Rejection of Claims 1-18 Under 35 USC §103(a) in view of U.S. Patent No. 6,308,272 (Pearce) and UK Patent Publication No. GB 2 227 107 (Sloan)

According to the Response to Arguments section of the final Office Action, this rejection has been maintained on the basis that the claims can be interpreted as reading on a security processor that erases the content of a security memory based on undershooting or overshooting of a threshold on a single sensor (even though claim 1 in fact recites multiple sensors for detecting external action on a component). In reply, independent claims 1 and 10 have been amended to further recite **cyclical storage** of sensor status data in an **over-writable memory** (in addition to the security member), as originally recited in claims 2 and 11, and the rejection of claims 1-18 under 35 USC §102(a) is respectfully traversed on the grounds that:

- a. neither the Pearce patent nor the Sloan publication discloses or suggests erasing data from a security memory based on attacks on a component containing both the security memory and sensors for detecting the attacks (Pearce is directed to sensing attacks on an external entity, while Sloan is directed to sensing biometric data—it is true that Sloan at least erases data, but not on the basis of thresholding of sensors indicating an attack on the component); and
- b. neither the Pearce patent nor the Sloan publication discloses or suggests the claimed thresholding of sensor data (whether from one or multiple sensors) in

combination with **cyclical storage of sensor data** in an **over-writable** (volatile) **memory** (the sensor data being transferred to a permanent memory upon detection of an attack, as described in the penultimate paragraph on the second to last page of the original specification);

- c. since neither Pearce nor Sloan suggests the claimed cyclical storage in an over-writable memory, neither could possibly suggest subsequent storage of the sensor data, when an attack occurs, in a non-volatile memory, as recited in claims 3 and 12.

As pointed out in the previous response, the Pearce patent is not concerned with detecting direct physical impact of an event on a data storage, but rather is concerned solely with the entrance of a person into a secured area, and therefore there is no possible need in the system of Pearce for erasure of data upon the occurrence of an event. Furthermore, while the Sloan publication does teach erasure of data, it only does so if a life function is below a threshold level for a preset time (or if successful biometric comparisons are not regularly performed), and again there is no need for erasure of data *upon sensing an attack based on the dual thresholds*. Thus, neither the Sloan publication nor the Pearce patent addresses the same problem as the present invention, and neither comes up with the claimed solution of erasing data upon sensing and overshoot *or* undershoot of sensor data, and cyclic recording of the sensor data.

In addition, since neither the Pearce patent nor the Sloan publication is concerned with the detection of external threats to a protected data storage, neither reference could have suggested the presently claimed **cyclical updating** of sensor data in a volatile or over-writable memory, which is necessary to ensure that the latest sensor data is stored before an attack occurs. The Pearce patent does disclose data logging, but only of threats to an external entity, which does not require the claimed cyclical storage of sensor data in an **over-writable memory**. To the contrary, since the monitoring device of Pearce is not itself under threat, *there does not appear to be any need* for such cyclic recording of sensor data. The Sloan patent, on the other hand, does not disclose or suggest any sort of permanent monitoring or recording of sensor status data,

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and therefore the Sloan patent could not possibly have suggested modification of the system of Pearce to include the claimed cyclic sensor data storage.

Because the Pearce patent and the Sloan publication do not disclose all elements recited in claims 1, 3-10, and 11-18, withdrawal of the rejection under 35 USC §103(a) is respectfully requested.

Having thus overcome each of the rejections made in the Official Action, withdrawal of the rejections and expedited passage of the application to issue is requested.

Respectfully submitted,

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